

Investigation into the Wholesale Billing Practices of
Wisconsin Bell, Inc. d/b/a SBC Wisconsin

6720-TI-183

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- 1. Please complete a separate form for each issue.*
- 2. Time permitting and to the extent possible, carriers with similar issues are encouraged to make a joint submission.*
- 3. Please do not include any confidential and/or CPNI information. How to handle confidential and/or CPNI information will be discussed at the July 30, 2003 prehearing conference.*
- 4. Please return to Nick Linden by e-mail (nicholas.linden@psc.state.wi.us) no later than the close of business (COB) Friday, July 25, 2003.*

Submitted by: (Name of Carrier(s)) AT&T

Contact [Name of Carrier Representative(s)]

Telephone Number: (NPA)-NXX-XXXX

e-mail:

David J. Chorzempa

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Subject Matter Expert (SME): (name)

Telephone Number: (NPA)-NXX-XXXX

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Shannie Tavares

510-276-8436

smtavares@att.com

Authorized Representative: (Name of person empower to make decisions and enter into agreements on behalf of the submitting carrier(s))

Telephone Number: (NPA)-NXX-XXXX

e-mail:

Depending on the issue, same as representatives noted above, with counsel from client groups.

Name: *(short identifier)* Global Issue AT&T Issue No. 1

Brief Description:

SBC continues to generate inaccurate wholesale bills. SBC continues to mis-bill CLECs and otherwise bill CLECs for lines they do not have.

Please answer the following questions:

1. When this issue was first discovered?
2. How many occurrences and approximately over how long a period of time?
3. Is it a recurring problem?
4. Your belief as to the cause of the problem.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?
7. Any other pertinent information?

AT&T refers to the other issues it has identified, all of which support this global issue.

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?
2. Was this issue escalated for dispute resolution? If so, when and in what forum?
3. Last known position of the opposing carrier.
4. Were any bill adjustments made to resolve this issue?
5. Were any policies or procedures changed to address this issue? If so, what changes were made?

AT&T refers to the other issues it has identified, all of which support this global issue.

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

AT&T refers to the other issues it has identified, all of which support this issue.

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.

2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?
4. Any other pertinent information?

AT&T refers to the other identified issues, which support this global issue.

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
2. Were any bill adjustments made to resolve this issue?
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

AT&T refers to the other issues it has identified, which support this global issue.

Submitted by: *(Name of Carrier)*

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-NXX-XXXX*

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Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

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Depending on the issue, see above, with consultation of clients.

Name: (*short identifier*) Notice and Verification of Billing Adjustments (ATT Issue 2)
Brief Description:

SBC fails to provide sufficient notice of significant billing adjustments. SBC provides these adjustments (credits or debits) absent any explanation or advanced notice. A recent example of this problem occurred just this summer when SBC conducted a review of bills to ensure consistency with state-approved rates. That review uncovered other problems, including inaccurate rate zones. AT&T received a \$600,000 debit without sufficient explanation or notice. SBC also does not provide CLECs the methodology by which SBC determined the credit or debit. AT&T has also recently received credits in June for over \$520,000 (concerning misbilling of operator assisted and directory assistance calls), but the reason for the credit was not clearly identified on the bill.

AT&T recommends the following:

- The process should require SBC to notify CLECs via Accessible Letter with simultaneous communication by Account Managers of the specific impact to each individual CLEC. This notification should occur well before any adjustments are applied to wholesale bills.
- SBC must attempt to reach agreement, and resolve any disagreements, re: the applicable contractual limitations on backbilling of both debits and credits, again before any adjustments are applied to wholesale bills
- SBC must provide sufficient back-up details to support the adjustment (for example, for the rate zone reclassification, that would include number of lines impacted, rate centers involved, etc.) before any adjustments are applied to wholesale bills.
- SBC must allow a reasonable interval for the CLEC to review the back-up detail and validate the adjustment before any adjustments are applied to wholesale bills.

Please answer the following questions:

1. When this issue was first discovered?
2. How many occurrences and approximately over how long a period of time?
3. Is it a recurring problem?
4. Your belief as to the cause of the problem.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?
7. Any other pertinent information?

This issue has existed for as long as SBC has provided bills, but has more recently surfaced as a result of the major reconciliation and audits SBC has conducted on billing in the former Ameritech region. It is a recurring problem. As to the cause, AT&T refers to the recommendations noted above. This is a high priority item.

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?
2. Was this issue escalated for dispute resolution? If so, when and in what forum?
3. Last known position of the opposing carrier.
4. Were any bill adjustments made to resolve this issue?
5. Were any policies or procedures changed to address this issue? If so, what changes were made?

To be provided.

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

See recommendations above.

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?
4. Any other pertinent information?

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
2. Were any bill adjustments made to resolve this issue?
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Submitted by: *(Name of Carrier)*

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

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Depending on the issue, same as representatives noted above, with counsel from client groups.

Name: (*short identifier*) Billing Dispute Resolution (AT&T Issue 3)

Brief Description :

The processes described in AT&T's ICAs are clear and sufficient, and do not require AT&T to fill out burdensome forms, or to interface with the LSC rather than the Account Team, in order to raise, document and attempt to resolve billing disputes. SBC did not attempt to modify that process in negotiation of the renewal ICAs.

- SBC has complained that AT&T is not following its standard process, which requires CLECs to fill out a Dispute Resolution form for each disputed TN, with no benefit of discussion to clarify issues before the dispute is initiated. It's our understanding that responses are returned at the TN level (e.g. if we raise a generic dispute affecting thousands of lines, we would receive thousands of responses back for the same issue).
- AT&T's current process is to discuss issues on a bi-weekly call with the Account Team and billing SMEs, to set up supplemental calls to discuss specific issues, and to document issues on an Issue Log and supplemental email message and correspondence.
- SBC has recently suggested that AT&T has to sign a Non Disclosure Agreement in order to enter into settlement discussions on disputed billing, which is a change to our established practices. Again, confidentiality provisions of the ICAs are sufficient and separate NDAs are not necessary.

Please answer the following questions:

1. When this issue was first discovered?
2. How many occurrences and approximately over how long a period of time?
3. Is it a recurring problem?
4. Your belief as to the cause of the problem.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?
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This is a recurring problem, as it relates to the manner in which AT&T is to raise billing disputes. AT&T does believe this issue is generic because it relates to SBC's onerous processes for raising billing disputes. However, AT&T also believes that these processes are inconsistent with its interconnection agreement. AT&T gives this issue high priority.

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?
2. Was this issue escalated for dispute resolution? If so, when and in what forum?
3. Last known position of the opposing carrier.
4. Were any bill adjustments made to resolve this issue?
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To be provided.

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

See recommendations on AT&T's process described above. SBC should eliminate its onerous dispute resolution requirements.

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?
4. Any other pertinent information?

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
2. Were any bill adjustments made to resolve this issue?
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

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Telephone Number: (NPA)-XXX-XXXX

e-mail:

Depending on the issue, same as representatives noted above, with counsel from client groups.

Name: (*short identifier*) CABS Reconciliation

Brief Description (AT&T Issue 4):

SBC's reconciliation after its CABS conversion is fraught with errors and based on a flawed methodology. SBC has not correctly calculated the debits and credits associated with its incorrect wholesale bills, is still disclosing information about the reconciliation on a piecemeal basis, and has not attempted to address any of the criticisms that CLECs have raised regarding the reconciliation.

Please answer the following questions:

1. When this issue was first discovered?
2. How many occurrences and approximately over how long a period of time?
3. Is it a recurring problem?
4. Your belief as to the cause of the problem.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?
7. Any other pertinent information?

SBC's so-called data bash reconciliation took place in January 2003. This reconciliation was intended upon synchronizing SBC's new CABS billing system and its provisioning databases (to ensure that all provisioned UNE-P orders were included in CABS). SBC had converted UNE-P billing to CABS in late 2001. This reconciliation uncovered massive problems with SBC's region-wide wholesale billing, with thousands of UNE-P orders being held and UNE-P orders not posting to SBC's billing system. This reconciliation proved that CLECs had not received timely, accurate, and auditable bills since the conversion of CABS in late 2001. The root cause of the problems is still unknown. In addition, SBC's methodology for calculating debits and credits is flawed, as is SBC's refusal to take corrective actions, such as providing more information as to the percentage of time that it used default dates in lieu of actual connect and disconnect dates, or confirming that it will revise debit or credit calculations. SBC has also improperly limited credits based upon contractual timeframes because there is no provision in the interconnection agreement that would operate to limit the duration of credits. AT&T designates this issue as high priority.

AT&T refers to its 271 comments filed in the Wisconsin 271 proceeding, as well as its declarations and comments filed in the FCC Michigan 271 proceedings. These documents provide the detail requested. AT&T has circulated a copy of those documents along with this form.

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?
2. Was this issue escalated for dispute resolution? If so, when and in what forum?
3. Last known position of the opposing carrier.
4. Were any bill adjustments made to resolve this issue?
5. Were any policies or procedures changed to address this issue? If so, what changes were made?

This issue has been raised with SBC in correspondence and in FCC 271 pleadings since the beginning of 2003. This issue has not been taken to formal dispute resolution as yet, although it is being raised in the context of the pending SBC 271 applications with the FCC. SBC refuses to take corrective action or to modify its positions.

AT&T further refers to its 271 comments filed in the Wisconsin 271 proceeding, as well as its declarations and comments filed in the FCC Michigan 271 proceedings. AT&T has provided some of those documents along with this form.

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

AT&T wishes to ensure that the reconciliation is accurate and that any problems uncovered in it, in regard to both systems and process, are fixed.

AT&T further refers to its 271 comments filed in the Wisconsin 271 proceeding, as well as its declarations and comments filed in the FCC Michigan 271 proceedings. AT&T has provided some of those documents with this form.

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?
4. Any other pertinent information?

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
2. Were any bill adjustments made to resolve this issue?
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible

letter(s).

7. Were any policies or procedures changed to address this issue? If so, what changes were made?

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Contact *[Name of Carrier Representative]*

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Depending on the issue, same as representatives noted above, with counsel from client groups.

Name: *(short identifier)* PM 17 Restatement
Brief Description (AT&T Issue 5):

SBC inappropriately refuses to restate PM 17 (the billing completeness timeliness measure) to reflect the late postings to CABS of orders affected by the CABS reconciliation.

Please answer the following questions:

1. When this issue was first discovered?
2. How many occurrences and approximately over how long a period of time?
3. Is it a recurring problem?
4. Your belief as to the cause of the problem.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?
7. Any other pertinent information?

AT&T refers to its discussion in AT&T Issue 4, which provides the requested information. In addition, AT&T notes that it has requested the restatement of this measure since it became aware of the CABS reconciliation problems (which were uncovered in January 2003). AT&T has made repeated requests for SBC to restate this measure. AT&T rates this issue as High priority.

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?
2. Was this issue escalated for dispute resolution? If so, when and in what forum?
3. Last known position of the opposing carrier.
4. Were any bill adjustments made to resolve this issue?
5. Were any policies or procedures changed to address this issue? If so, what changes were made?

AT&T has made repeated requests for SBC to restate this measure in the context of the FCC's Michigan 271 review. SBC refuses to do so.

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

Restatement of PM 17.

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

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Depending on the issue, same as representatives noted above, with counsel from client groups.

Name: (*short identifier*) July 2003 Adjustments (AT&T Issue 6)

Brief Description:

In July 2003, SBC identified a number of additional adjustments to AT&T's bills as a result of further billing inaccuracies. SBC has not provided root cause information or disclosed its methodology for determining the credits/debits resulting from these latest errors (which uncovered such errors as loop misclassification errors), leaving AT&T with no ability to determine whether SBC's corrections were accurate.

Please answer the following questions:

1. When this issue was first discovered?
2. How many occurrences and approximately over how long a period of time?
3. Is it a recurring problem?
4. Your belief as to the cause of the problem.
5. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
6. What priority would you give this issue? In other words, how would you rank this issue in terms of importance and urgency: High, Medium or Low?
7. Any other pertinent information?

This issue was discovered in July of 2003 as a result of phone calls between SBC's Cathy Wyban and AT&T's Shannie Tavares. At this point, we are unsure of the root cause, although it appears to include overbilling and underbilling due to SBC zone misclassification errors, billing table errors, and errors concerning charges for Directory Assistance Call Completion and Operator Assistance. AT&T is unsure of SBC's process for determining these corrections, which is part of the problem, as we must ensure that SBC's methodology is accurate.

AT&T further refers to its 271 comments and declarations filed in the FCC Michigan 271 proceedings, which have been provided along with this issue.

Please answer the following questions:

1. Was this issue raised with the opposing carrier? If so, when and how?
2. Was this issue escalated for dispute resolution? If so, when and in what forum?
3. Last known position of the opposing carrier.
4. Were any bill adjustments made to resolve this issue?
5. Were any policies or procedures changed to address this issue? If so, what changes were made?

AT&T refers to Joint Reply Declaration of Shannie Tavares and Sarah DeYoung, filed in WC

Docket No. 03-138 and attached to this issue. Suffice to say, AT&T was made aware of this issue in July 2003 and has sought additional information on this issue from SBC since that time.

(Described relief desired or needed including, but not limited to, proposed changes to Performance Measurements (PMs).)

AT&T believes that SBC's adjustments should be accurate and verifiable. AT&T believes that any process or system issues causing this problem, and the consistent inability of SBC to provide accurate bills, must be fixed.

(Briefly respond to submitting carrier(s) by either agreeing or disagreeing with statements made above, and by answering the following questions.)

A. Analysis of Issue

1. Your belief as to the cause of the problem.
2. Does this issue involve an interpretation and/or application of law, contract or tariff? If so, please explain.
3. What performance measures can be implemented to monitor the desired system operation?
4. Any other pertinent information?

B. Prior Attempts to Resolve the Issue

1. Last known position of the submitting carrier.
2. Were any bill adjustments made to resolve this issue?
3. How were the adjustments communicated to the submitting carrier? Please attach any relevant accessible letter(s).
4. Identify any other carrier(s) known to have experienced similar problems.
5. Did you identify any other problems arising from or related to this issue?
6. What steps, if any, did you take to proactively identify other billing issues arising from or related to this issue? Please attach any relevant accessible letter(s).
7. Were any policies or procedures changed to address this issue? If so, what changes were made?

Submitted by: *(Name of Carrier)*

Contact *[Name of Carrier Representative]*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Subject Matter Expert (SME): *(Name)*

Telephone Number: *(NPA)-NXX-XXXX*

e-mail:

Authorized Representative: *(Name of person empowered to make decisions and enter into agreements on behalf of the opposing carrier.)*

Telephone Number: (NPA)-NXX-XXXX
e-mail:

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